

From: [Bill Jacobs](#)  
To: [elray.roper@syngenta.com](mailto:elray.roper@syngenta.com)  
Subject: RE: Syngenta Multiplex Rodent bait station  
Date: 09/11/2008 10:15 AM

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Thank you.

▼ [<elray.roper@syngenta.com>](mailto:elray.roper@syngenta.com)

<elray.roper@syngenta.com>

To Bill Jacobs/DC/USEPA/US@EPA  
cc  
09/11/2008 10:10 AM  
Subject RE: Syngenta Multiplex Rodent bait station

Bill:  
Thanks for the list. We are working with our supplier on some patent issues around modifications. I will let you know as soon as we have reached a decision on what we are going to do.

ElRay Roper  
Syngenta Professional Products

-----Original Message-----

From: Jacobs.Bill@epamail.epa.gov [mailto:Jacobs.Bill@epamail.epa.gov]  
Sent: Thursday, September 11, 2008 3:35 AM  
To: Roper ElRay USGR  
Subject: RE: Syngenta Multiplex Rodent bait station

The last dated and released version of the list appears in the attached .pdf file. Only one station was added to the list since it was appended to PR Notice 94-7. The list is currently undergoing revision. If the Multiplex is altered as we have discussed, it could appear on the new version that is expected to become available shortly or in a subsequent revision.

(See attached file: StnList042596.pdf)

<elray.roper@syngenta.com>

To 09/10/2008 04:55 PM Bill  
Jacobs/DC/USEPA/US@EPA  
cc

Subject RE: Syngenta Multiplex  
Rodent bait  
station

Bill:  
Thanks for the quick reply.  
Where can I get a copy of the most current list of "adequately protective" stations?

ElRay Roper

-----Original Message-----

From: Jacobs.Bill@epamail.epa.gov [mailto:Jacobs.Bill@epamail.epa.gov]  
Sent: Wednesday, September 10, 2008 10:54 AM  
To: Roper ElRay USGR  
Subject: Re: Syngenta Multiplex Rodent bait station

A reasonably firm lip on the bait tray insert (or on the station itself) is a design feature that is needed to meet criterion #6 for tamper-resistant bait stations (see PR Notice 94-7). If such a feature were added, the station could be added to the list of "adequately protective" units. The units listed there are bait stations that are sold empty. The testing that was done on the unit with dogs and children addressed issues related to other criteria, principally #2 & #4, and would not have to be repeated.

The center rod position would not necessarily have to be removed, but instructions accompanying the unit should advise against using the center rod position when the station is deployed in areas where young children (under 6 years old) are likely to be present. Statistically, the present design passed the child test. It's just that the 2 kids who were able to touch the bait contacted bait that was on the center rod.

Keep in mind that the above discussions pertain to the marketing of the station in the "empty" condition (i.e., without bait packaged in or with the unit). If the station were sold as part of a ready-to-use bait-station product, dog and child tests with unsecured units would have to be run if you desired to have it labeled as a Tier 1 or Tier 2 product. For Tier 3, child testing with unsecured units would be needed. Adult-utility testing would be needed for Tiers 1, 2, or 3.

If you elect to modify the mold for the bait station to add a lip or remove the center rod position, you might also consider beefing up the hinge arrangement that holds the lid to the base and perhaps providing additional overlap to the locking mechanism. Although I rated the current and original designs sufficient in those areas, they are potential weak points relative to other components of the product's design. I have received "unsolicited feedback" to the effect that the lids on locked units can be lifted without need to use the special tool by simply pulling up hard on the tab. That was not my experience when I evaluated the original design in 2003 or the current design in 2007. However, I did find that units would not fully lock unless the lid was pushed down until a distinctly audible "snap-to" sound was heard. A unit closed not quite to the "snap-to" point may appear to be locked but can be opened relatively easily. If it does not already, the product's literature should indicate how to confirm that the locking mechanism is fully engaged.

<elray.roper@syngenta.com>